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December 17, 2021

Honorable Debra C. Freeman
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 17A
New York, NY 10007

**Letter Motion:
SECOND Extension of Time
Request**

Re: Rosa O Ellis v. Comm'r of SSA 1:20-cv-09627-VEC-DCF

Dear Honorable Judge Freeman:

Pursuant to the Revised Scheduling Order in the above referenced case, Plaintiff's Motion for Judgment on the Pleadings is due on December 20, 2021.

Plaintiff writes to respectfully request the Court's indulgence with a second request for an extension of time to serve his motion. Plaintiff expected to complete his brief herein in compliance with the revised scheduling order but was unable to do so due to staffing issues and multiple motions coming due on or about the same date. Plaintiff therefore writes to respectfully request a second extension of time of sixty days (60), with the following proposed revised Scheduling Order:

- a) Plaintiff to serve her motion on or before February 18, 2022;
- b) Defendant to serve his cross motion on or before April 19, 2022;
- c) Plaintiff to serve her Reply, if any, on or before May 10, 2022.

Defendant has given consent to this request for a second extension. Thank you in advance for the Court's consideration of this request.

Respectfully Submitted,

/s/Eddy Pierre Pierre
Eddy Pierre Pierre, Esq.
Attorney for Plaintiff
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Cc: Susan D. Baird, Esq. (Via ECF)
Attorney for Defendant.

Although the Court acknowledges that it did not rule on this request, it also notes that Plaintiff did not, as proposed, file a motion by 2/15/2022, nor has Plaintiff taken any further steps to pursue the matter since then, even though more than a month has now passed since that date. Under the circumstances, the Court expects that Plaintiff's motion for judgment on the pleadings will be filed no later than 4/21/2022. Defendant's opposition and cross-motion shall be filed no later than 6/20/2022. Plaintiff's reply, if any, shall be filed no later than 7/11/2022.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

Dated: 3/22/2022